



ZACHARY W. CARTER
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

Shira Siskind
Assistant Corporation Counsel
(212) 356-2414
(212) 356-3509 (fax)
siskind@law.nyc.gov

November 7, 2016

BY ECF

Hon. Pamela K. Chen
United States District Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Rodney Marshall v. City of New York, et al.
15-cv-6096-PKC-JO

Your Honor:

I am an Assistant Corporation Counsel in the Office of Zachary W. Carter and the attorney assigned to the defense of the above-referenced matter. Defendants write to respectfully request: (1) a brief extension of time, from November 7, 2016, until November 10, 2016, to file their Rule 56.1 statement with the Court; and (2) that the December 2, 2016 pre-motion conference be moved to a time earlier that day. Plaintiff's Counsel, Gabriel Harvis, Esq., consents to these requests. This extension will not affect any other scheduled dates.

Due to obligations in other matters, defendants will be unable to complete the 56.1 statement in time to have it filed today. Therefore, defendants are requesting a brief extension of time, until November 10, 2016, to file their 56.1 statement. Should the Court grant this request, defendants also respectfully request that plaintiff's time to file his counter 56.1 statement be extended to November 28, 2016.

Finally, because the undersigned is Sabbath observant and must travel home to observe the Sabbath well before sundown on Friday afternoons, the undersigned also respectfully requests that the pre-motion conference, which is currently scheduled for 1:00 p.m. on December 2, 2016, be moved to an earlier time on that same date. The parties are available at 9:00 a.m., 9:30 a.m., or 11:30 a.m. that morning should those times work for the Court.

Defendants thank the Court for its time and consideration of these requests.

Respectfully submitted,

/s

Shira Siskind
Assistant Corporation Counsel
Special Federal Litigation Division

cc: Magistrate Judge James Orenstein (by ECF)

Gabriel Harvis, Esq. (by ECF)
Attorney for Plaintiff